

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA)
Plaintiff)
v.) Case No. CR-24-080-Raw
CRYSTAL FAYE CHESSER,)
Defendant)

**DEFENDANT CHESSER'S UNOPPOSED MOTION TO EXTEND FILING DEADLINE
FOR RESPONSE TO GOVERNMENT'S MOTION IN LIMINE**

Comes now the Defendant, Crystal Faye Chesser, by and through her attorney, Dan Medlock, and respectfully requests the Court to extend the Defendant's response deadline to the Government's Motion in Limine (Doc. #50) to October 16, 2024. As ground for said request, the Defendant states as follows:

1. In compliance with Local Criminal Rule 12.1(B), Counsel advises the Court that he has conferred with Michael Robinson, Assistant United States Attorney, and is authorized to state that the Government has no objection to this Motion.

2. Defendant was arraigned on May 20, 2024. Defendant was charged by Sealed Indictment on May 15, 2024. (Doc. #2). The Government did not seek detention of Defendant, and Defendant was released on an unsecured bond, subject to conditions.

3. On September 25, 2024, the Government filed a Motion in Limine. (Doc. #50). Per Local Criminal Rule 12.1(E), the Defendant must file its response within seven (7) days of the motion, which would be October 2, 2024, unless the Court orders otherwise.

4. On September 25, 2024, Codefendant Jason Cole filed an Unopposed Joint Motion to Continue Jury Trial. (Doc. #56). On September 27, 2024, the Court granted this continuance. (Doc. #58). Jury trial is set for December 3, 2024.

5. The Government's Motion in Limine concerns information related to Trooper E.M. that counsel was not fully aware of prior to the Government's motion. Counsel needs additional time to properly review this information and prepare a response to the Government's motion.

6. This request will not affect any other pretrial or trial settings and the purpose of this request is not for delay of the trial in this case.

Based on the foregoing, the Defendant respectfully requests the Court to extend the Defendant's response deadline to the Government's Motion in Limine to October 16, 2024.

Respectfully submitted,

s/ Dan Medlock
Dan Medlock, OBA #20092
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CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2024, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Michael Robinson, Assistant United States Attorney

s/ Dan Medlock
Dan Medlock
Attorney for Defendant Chessier